Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate Unlawful Robocalls	)	CG Docket No. 17-59
	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97
	)	

VERIZON'S COMMENTS ON PUBLIC NOTICE[1]

Verizon is using the tools that the Commission has made available to authorize more robust and more widespread blocking of illegal and unwanted robocalls. Verizon also continues to enhance and expand its blocking programs. We are leveraging various tools, including the STIR/SHAKEN call authentication technology and our extensive "honeypot" program (which identifies unwanted and illegal calls with a high degree of precision and certainty), to provide our customers with industry-leading anti-robocall protections. Verizon looks forward to working with the Commission to move robocall mitigation into a higher gear in coming months as the Commission takes up further helpful proposals, such as supporting call blocking with a safe harbor and other actions to help reduce the number of illegal robocalls thrust upon consumers.

A. Verizon Is Protecting More Customers than Ever With the Most Effective Robocall Protections Available.

In August 2019, Verizon announced that it was beginning to auto-enroll wireless customers into its Call Filter blocking tool using the green light the Commission gave earlier in

---

[1] *Consumer and Governmental Affairs Bureau Seeks Input for Report on Call Blocking*, CG Docket No. 17-59, Public Notice, WC Docket No. 17-97 (released December 20, 2019). Verizon has received G. Patrick Webre's letter to Verizon CEO Hans Vestberg (dated January 23, 2020) asking specific questions relating to the Notice and will respond by the reply deadline.

the summer to provide default blocking.[2] Because of that action, today Verizon is providing our flagship robocall blocking service on a default basis to tens of millions of additional Verizon Wireless customers. We are enrolling millions of new customers weekly in this default Call Filter blocking experience, while empowering them to set their preferred level of robocall protection – or, if they so choose, to opt out entirely from robocall blocking.

On the wireline side, Verizon first deployed its free Spam Alerts robocall labeling service to wireline customers in early 2018, becoming the first wireline service provider to provide meaningful robocall protections to wireline customers served by all types of technology (copper as well as fiber).[3] The service is available at no additional charge to all landline voice customers with Caller ID, and it displays "SPAM?" before a caller's name if the calling number matches certain criteria designed to identify likely spam. Also, a majority of Verizon's wireline customers are in service areas where they can sign up for Nomorobo, a third-party provider we collaborate with to offer our customers additional effective blocking tools. Nomorobo provides a free blocking service using the simultaneous ring feature available to customers who receive Voice over Internet Protocol (VoIP) service. Verizon makes sure its FiOS Digital Voice customers, who receive the simultaneous ring feature for free, are aware of the Nomorobo option.

---

[2] *See Verizon helps customers avoid more than 1.5 billion robocalls this year*, Verizon News (August 27, 2019), https://www.verizon.com/about/news/verizon-helps-customers-avoid-15-billion-robocalls; s*ee also In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor*, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, CG Docket No. 17-59, WC Docket No. 17-97 (released June 7, 2019).

[3] *See SPAM? Verizon gives you a new tool to avoid those pesky robocalls with new Caller ID feature*, Verizon News (April 16, 2018), https://www.verizon.com/about/news/block-spam-robocalls-with-verizon-new-tool.

While the Commission has appropriately encouraged and supported the deployment of consumer-facing blocking tools, it also has correctly recognized that network-based blocking (i.e., across-the-board, not opt in or opt out) can have important consumer protection benefits.[4] Under the Commission's 2017 blocking order, Verizon has blocked hundreds of millions of calls falling into the categories that the order authorizes us to block (i.e., calls coming from invalid numbers, from numbers that are unallocated or not assigned to any subscriber, and where we are authorized by the person assigned a number to block calls from that number).

Consumers have particularly benefitted from the "Do Not Originate" ("DNO") network blocking that Verizon has implemented for federal partners in order to combat impersonation fraud. Verizon is currently blocking calls from over 1,600 numbers that federal agencies have told us they never use for outbound calling, and that fraudsters can spoof in order to impersonate those agencies. Verizon was a DNO pioneer, working first with the IRS to stop fraudsters from spoofing its numbers in order to impersonate IRS personnel. More recently, Verizon has worked with the Social Security Administration (which many scammers started targeting after they found their IRS scams increasingly stymied) on a DNO program that has blocked more than 10 million calls in just the past three months – calls that would otherwise have terminated to U.S. consumers and resulted in substantial financial harm.

[4] *In re Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 9706 (November 17, 2017).

B. Verizon Employs Industry-Leading Techniques to Avoid Blocking Good Calls, and We Are Continually Improving.

Verizon uses various tools to help calibrate and refine our blocking and labeling tools and to care for legal robocallers whose calls theoretically could be incorrectly identified as spam. Last summer, after we finished implementing STIR/SHAKEN for our wireless customer base, Verizon enhanced our Call Filter blocking and labeling service by incorporating the STIR/SHAKEN status of incoming calls into our analytics engine. That has helped us avoid blocking thousands of calls that would have otherwise been blocked. For example, where a legitimate customer's number is spoofed by a bad actor and that bad actor's calls trigger our blocking algorithm, we are able to block the spoofed numbers but not the authenticated (legitimate) calls that our customer makes. As STIR/SHAKEN becomes more widely deployed and we increase the volume of STIR/SHAKEN-enabled traffic exchanged with other service providers, these tangible consumer benefits will increase.

Another vehicle for addressing the false positive risk is Verizon's voice spam feedback website,[5] which invites legitimate calling parties and consumers to tell us about calls that they believe are treated incorrectly—both calls incorrectly identified as spam and ones that should have been identified as spam but were not. It also permits calling parties to tell us about their operations (such as the numbers they use and the nature of their calling campaigns), even if they are not aware of any issues with our labeling or blocking, so that the third-party vendor that analyzes traffic for Verizon's blocking/labeling tools can take that information into account. Verizon also educates calling parties about "best practices" and about the sorts of calling

---

[5] *See* Verizon, *Verizon spam feedback*, https://www.voicespamfeedback.com/vsf/.

activities that can result in their calls being identified as spam, so that they have the opportunity to adjust their operations in order to avoid becoming caught up in Verizon's or other parties' blocking or labeling tools.[6]

Also, Verizon's data scientists validate and improve the accuracy of our call blocking activities with data from a dynamic honeypot-based robocall monitoring program that they operate.[7] The honeypot constitutes thousands of telephone numbers that Verizon has configured to receive incoming illegal and unwanted robocalls as robocallers call these numbers in the course of their operations. The data collected by the honeypot include not only basic information about the calls (e.g., calling party number time, duration) but also metadata associated with IP calls and recorded voicemails that we transcribe and analyze. This honeypot program helps us identify and categorize mass calling campaigns with a high degree of certainty.

C. Verizon Is Leading the Industry on Other Robocall Mitigation Activities that All Service Providers Should Embrace.

No voice service provider should ever look the other way when it knows or should know that one of its customers is making millions of spam robocalls on its network. But many do just that, and many more providers "downstream" from those complicit providers accept their traffic without asking any questions. Such complicity and complacency needs to stop.

As Verizon has explained to the Commission, we have a "know your customer" program that analyzes traffic from both wholesale and retail customers on IP platforms to identify patterns

---

[6] *See* https://www.voicespamfeedback.com/vsf/bestPractices.

[7] This honeypot program is also used for other robocall mitigation purposes such as identifying illegal robocalling campaigns that are candidates to be traced back and handed off to law enforcement for investigation.

associated with potentially illegal robocalling.[8] Verizon has developed a set of "best practices" that define and set measurable objectives for characteristics associated with suspicious robocalling, which we have shared with others in the industry. Verizon is also taking other actions to keep robocalls off our networks, such as pressing other service providers that send us traffic to adhere to basic, common-sense measures to make sure their traffic is not illegal. For example, Verizon has a program for requiring its existing wholesale customer base to sign a contract amendment committing them to participate in industry traceback and to implement similar agreements with their upstream customers.[9]

Unfortunately, some other companies are not moving quickly enough to adopt "know your customer" or other practices to clean up traffic flowing among service providers. Unless industry begins to coalesce on meaningful ways to shut down the complicit originating service providers and to stop complacent downstream carriers from accepting their traffic, the Commission should step in. The TRACED Act authorizes the Commission to publish a list of service providers that are "found to originate or transmit substantial amounts of unlawful robocalls."[10] The Commission should explore ways to exercise that authority to impose robust but targeted "know your customer" obligations on complicit service providers and on the complacent downstream providers that accept their traffic.

---

[8] *See In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls*, Comments of Verizon on Public Notice, CG Docket No. 17-59, at 9-14 (July 20, 2018).

[9] Consumers are benefitting from Verizon's action pushing throughout the ecosystem this obligation to participate in industry tracebacks. The traceback consortium led by USTelecom has over the past year begun to routinely trace illegal robocalls all the way to the originating service providers. That allows the consortium to hand off actionable leads so that law enforcement can investigate and shut down the scammers. Historically, tracebacks would frequently dead-end only a few hops upstream from the terminating carrier because a service provider would refuse to respond to the traceback request.

[10] Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105, 133 Stat. 3274 (2019).

***

The tide is starting to turn in the war against robocalls. The Commission and the service provider community now have the most extensive set of tools ever available to fight back. Verizon looks forward to supporting efforts by the Commission and industry alike to take robocall mitigation to the next level.

Respectfully submitted,

/s/ Gregory M. Romano

William H. Johnson
Of Counsel

Gregory M. Romano
Christopher D. Oatway
John A. Conroy III
Verizon
1300 I Street, N.W.
Suite 400 West
Washington, DC 20005
(202) 515-2400

Attorneys for Verizon and Verizon Wireless

January 29, 2020